

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**WESTLAKE VINYLS COMPANY, L.P.  
EDC Marine Loading Operations  
36045 Hwy 30, Geismar, Ascension Parish, Louisiana  
Agency Interest Number: 1138  
Activity Number: PER20080001  
Proposed Permit Number: 2843-V1**

**I. APPLICANT**

**Company:**

Westlake Vinyls Company, L.P. – EDC Marine Loading Operations  
PO Box 228  
Geismar, Louisiana 70734-0228

**Facility:**

Westlake Vinyls Company, L.P.  
36045 Hwy 30, Geismar  
Ascension Parish, Louisiana

Latitude of Facility Front Gate: 30 Deg 20 Min 45 Sec

Longitude of Facility Front Gate: 91 Deg 15 Min 28 Sec

**II. FACILITY AND CURRENT PERMIT STATUS**

Westlake Vinyls Company, L.P. (WVC) owns and operates a chemical manufacturing facility in Geismar, Louisiana. The WVC complex has plants that produce ethylene dichloride (EDC), vinyl chloride monomer (VCM), and polyvinyl chloride (PVC). The Westlake Vinyls Co, LP – EDC Marine Loading Operations currently operates under Permit No. 2843-V0, issued August 6, 2003.

Westlake Vinyls Company, L.P. – EDC Marine Loading is a designated Part 70 source. One Part 70 permit has been issued to the operating units within the complex. These include:

<b>Permit No.</b>	<b>Unit or Source</b>	<b>Date Issued</b>
PSD-LA-535(M-2)	Cogen II Unit	5/29/2001
2872-V0	Biological Treatment Plant	7/26/2005
2699-V4	Utilities Plant	1/25/2008
2874-V1	PVC Plant	9/11/2006
1248-V2	VCM-E Plant	9/5/2007
3057-V0	Chlor-Alkali Plant	7/3/2007

**Westlake Vinyls Company, L.P. – EDC Marine Loading Operations**  
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**Westlake Vinyls Company, L.P.**  
**Geismar, Ascension Parish, Louisiana**

### **III. PROPOSED PROJECT/PERMIT INFORMATION**

#### **Application**

A permit application and Emission Inventory Questionnaire were submitted by Westlake Vinyls Co, LP on December 19, 2007 requesting a Part 70 operating permit renewal.

#### **Project**

1,2-Dichloroethane or Ethylene dichloride (EDC) is manufactured in the VCM-E/EDC production unit. Purified anhydrous EDC is either further processed to manufacture vinyl chloride or stored as a product for sale. The EDC to be used for product is purified and transferred to storage. The stored EDC product is transferred via aboveground pipeline to loading operations for shipments in barges. Vapors displaced from barge filling are rerouted back to the EDC storage tank. System operational pressure is maintained on the storage tank via an electrical compressor. Any excess pressure generated by the marine loading operations is vapor balanced back to the EDC product storage tank where any excess pressure vents to the vent incineration system located in the VCM-E Plant (permitted under Permit No. 1248-V2) for further regulatory required control. Vents are routed to the Primary Vent Incinerator located in the VCM-E Plant. As necessary, a Secondary Vent Incinerator and VCR Process Unit are available for vent control. Vent control operational and regulatory requirements for this marine loading system have been addressed in the Title V permit application for the VCM-E Plant (Primary and Secondary Incinerator). Barge loading operations will be identified as a source of vents to these units.

This permit is a renewal of a Part 70 Operating permit and includes a reconciliation to the Fugitive emissions based on an updated component count with a 20% contingency factor.

#### **Proposed Permit**

Permit 2843-V1 will be the renewal Part 70 operating permit for the EDC Marine Loading Operations.

#### **Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

**Westlake Vinyls Company, L.P. – EDC Marine Loading Operations**

**Agency Interest No.: 1138**

**Westlake Vinyls Company, L.P.**

**Geismar, Ascension Parish, Louisiana**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	-	-	-
SO <sub>2</sub>	-	-	-
NO <sub>x</sub>	-	-	-
CO	-	-	-
VOC *	0.11	0.10	-0.01

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,2-Dichloroethane	0.11	0.10	-0.01

Total

#### **IV REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.